

# Gelber Schachter & Greenberg

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November 15, 2019

**Via ECF**

Hon. Debra Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 17A  
New York, NY 10007

Re: *Manhattan Safety Maine, Inc., et al. v. Michael Bowen, et al.*, 19-cv-5642-LGS-DCF

Dear Judge Freeman:

Defendants Arie Genger, Arnold Broser, David Broser, ADBG LLC, and Tedco, Inc. ("Defendants") jointly submit this letter to inform the Court of the briefing schedule Defendants and Plaintiffs Manhattan Safety Maine, Inc. and Recovery Effort, Inc. have agreed to for the supplemental submissions the Court requested at the November 12, 2019 telephonic case management conference on the issue of whether this case should be stayed.

Specifically, Defendants will file a 5-page opening letter brief by 12:00 p.m. on November 19, 2019. Plaintiffs will file a 5-page opposition by 2:00 p.m. on November 25, 2019. Defendants will then file a 3-page reply by November 27, 2019.

Finally, in light of the temporary stay that the Court imposed at the November 12 telephonic conference, Defendants do not plan to submit their motion to dismiss on or by the previously scheduled date of December 6, 2019. In the event that the Court lifts the stay, Defendants will ask the Court for a new schedule for their motion to dismiss.

Respectfully submitted,

/s/ Christopher Gartman

Christopher Gartman  
Hughes Hubbard & Reed LLP

Respectfully submitted,

/s/ Natalia B. McGinn

Natalia B. McGinn  
Gelber Schachter & Greenberg, P.A.